

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**NOTICE OF DEBTORS' SECOND MOTION FOR ENTRY OF AN ORDER
EXTENDING THE TIME TO OBJECT TO PROOFS OF CLAIM FILED BY LABOR
PLAINTIFFS**

PLEASE TAKE NOTICE that, on February 28, 2026, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Second Motion of the Debtors for Entry of an Order Extending the Time to Object to Proofs of Claim file by Labor Plaintiffs* (the "Motion"). Pursuant to the Fifth Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or hearing if no party in interest files a response or objection **within twenty-one (21) days** from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at Clerk at the United States Bankruptcy Court for the Northern District of Georgia, 75 Ted Turner Drive, SW, Suite 1340, Atlanta, Georgia 30303, and serve a copy on the Debtors' attorney, at Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com), and any other appropriate persons by the objection deadline.** The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the Motion has been scheduled for March 31, 2026. The Court will hold a hearing on the Motion at **1:30 p.m. (prevailing Eastern Time) on March 31, 2026 in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303.**

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested in the Motion without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Date: February 28, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,²

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**SECOND MOTION FOR ENTRY OF AN ORDER EXTENDING
THE TIME TO OBJECT TO PROOFS OF CLAIM FILED BY LABOR PLAINTIFFS**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), submit this second motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the deadline for the Debtors to object to Proofs of Claim filed by Labor Plaintiffs (the “Claims Objection Deadline”) through and including April 30, 2026, pursuant to sections 105(a) and 502 of 11 U.S.C. §§101-1532 (the “Bankruptcy Code”), Rules 3007 and 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9006-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), without prejudice to the Debtors’ right to seek additional extensions. In support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a

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core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9006, and Rule 9006-1 of the Local Rules.

BACKGROUND

I. Chapter 11 Cases

3. On August 4, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

4. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On August 14, 2025, the United States Trustee for Region 21 (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”).

6. No request has been made for the appointment of a trustee or an examiner.

7. Additional information regarding the Debtors’ businesses, capital structure, and the circumstances leading to the filing of these Chapter 11 Cases is set forth in the First Day Declaration [D.I. 14], which is fully incorporated herein by reference.

II. The Claims Reconciliation Process

8. On September 4, 2025, the Debtors filed the *Debtors Motion Seeking Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claims; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief*

[D.I. 137] (the “Bar Date Motion”).

9. Objections to the Bar Date Motion were filed by the Committee [D.I. 169] and by creditors Yucong Liu, Yixiang Zhang, and Cangen Han (collectively, the “Labor Plaintiffs”) [D.I. 197] and after two hearings on the Bar Date Motion, on October 9, 2025, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proof of Claims; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [D.I. 222] (the “Bar Date Order”), designating November 21, 2025 as the date by which all entities and individuals (except governmental units) are required to file proofs of claim in the Chapter 11 Cases.

10. At a November 5, 2025 hearing on the *Labor Plaintiffs’ Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen* [D.I. 244], the Court ordered the Debtors and the Labor Plaintiffs to attend mediation which is set to occur on January 20, 2026.

11. At the November 5, 2025 hearing, the Court set a deadline for the Debtors to file their objection to the Labor Plaintiffs’ proofs of claim on or before January 16, 2026. The January 16 deadline was not contained in the Court’s *Order Authorizing and Directing Mediation and Appointing Settlement Judge* [D.I. 264].

12. The Debtors filed their *Consent Motion to Extend Time to Object to Proofs of Claim filed by Labor Plaintiffs* [D.I. 305] on January 16, 2026. Thereafter, the Debtors filed their *Amended Motion to Extend Time to Object to Proofs of Claim filed by Labor Plaintiffs* [D.I. 310]. On February 12, 2026, the Court entered the *Order Extending the Time for Debtors to Object to Proofs of Claim Filed by Labor Plaintiffs*, extended the Claims Objection Deadline through and

including February 28, 2026.

13. The Debtors and the Labor Plaintiffs participated in a mediation before the Hon. Jeffrey Cavender on January 20, 2026 and in subsequent weeks, which ultimately resulted in an agreement in principle to settle the Labor Plaintiffs' claims. The agreement in principle is subject to certain contingencies which have not yet been met.

14. The Debtors file this Motion seeking a further extension of the Claims Objection Deadline to foster the potential resolution of the Labor Plaintiffs' claims.

RELIEF REQUESTED

15. The Debtors respectfully request entry of the Proposed Order because an additional extension of the Claims Objection Deadline is necessary to reduce expense and foster the claims resolution process. The Debtors request that this Motion be considered without prejudice to their rights to seek further extensions of the Claims Objection Deadline.

BASIS FOR RELIEF

16. The Court is authorized to extend the Claims Objection Deadline under Bankruptcy Rule 9006, which provides that the Court may extend a time period provided under the Bankruptcy Rules or order of the Court for cause shown, with certain exceptions not applicable here. Fed. R. Bankr. P. 9006(b). Although the Bankruptcy Code does not define "cause," it has been noted that "courts should be liberal in granting extensions of time sought before the period to act has elapsed, so long as the moving party has not been guilty of negligence or bad faith and the privilege of extension has not been abused." COLLIER ON BANKRUPTCY ¶ 9006.06[2] (Alan N. Resnick & Henry J. Sommer eds., 16th ed. rev. 2016).

17. Moreover, section 105(a) of the Bankruptcy Code provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions

of this title.” 11 U.S.C. § 105(a). It is generally recognized that “[s]ection 105(a) authorizes the bankruptcy court, or the district court sitting in bankruptcy, to fashion such orders as are required to further the substantive provisions of the Bankruptcy Code.” COLLIER ON BANKRUPTCY ¶ 105.04 at 105-15, n.5 (15th ed. rev. 1989).

18. Courts in this district have regularly granted the relief requested herein. See, e.g., *In re Fulcrum Loan Holdings, LLC*, Case No. 24-56114 (Bankr. N.D. Ga. Nov. 4, 2025) [Docket No. 333] (extending claim objection deadline by 60 days); *In re Envistacom, LLC*, Case No. 23-52696 (Bankr. N.D. Ga. Nov. 1, 2024) [Docket No. 273] (extending claim objection deadline by 120 days in addition to a previously granted 120-day extension); *In re Clayton General Group, Inc.*, Case No. 15-64266 (Bankr. N.D. Ga. Apr. 23, 2019) [Docket No. 1289] (extending claim objection deadline by 60 days in addition to a previously granted 90-day extension).

19. The Debtors submit that cause exists to extend the Claims Objection Deadline because the proposed extension will facilitate the claims resolution process and reduce expenses.

20. Therefore, the Debtors submit that the extension of the Claims Objection Deadline requested herein is: (i) reasonable and necessary under the circumstances; (ii) well within the range of extensions granted in comparable chapter 11 cases; and (iii) inures to the benefit of creditors and parties in interest. As such, the Debtors respectfully request that the Court grant the proposed extension of the Claims Objection Deadline, without prejudice to their rights to seek a further extension of such deadline.

NOTICE

21. The Debtors will provide notice of this Motion to the following parties or their respective counsel, if known: (a) the Office of the U.S. Trustee for the Northern District of Georgia, (b) the Committee; (c) the Debtors’ prepetition and postpetition lenders; (d) the Limited

Service List; (e) the Labor Plaintiffs; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Dated: February 28, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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Counsel for the Debtors and Debtors in Possession

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:

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Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

Re Docket No. ____

**SECOND ORDER EXTENDING THE TIME FOR DEBTORS TO
OBJECT TO PROOFS OF CLAIM FILED BY LABOR PLAINTIFFS**

Upon the *Second Motion of the Debtors for Entry of an Order Extending the Time to Object to Proofs of Claim filed by Labor Plaintiffs* (the “Motion”);² and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue of these Chapter 11 Cases and the

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² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Motion; and no objection to the Motion having been filed prior to the Objection Deadline; and based on the foregoing, no further notice or hearing is required and the Court finds that good cause exists to grant the relief requested in the Motion; and the Court having considered the Motion and all other matters of record, including the lack of objection thereto,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The Claims Objection Deadline is hereby extended through and including April 30, 2026, without prejudice to the right of the Debtors to seek further extensions of such deadline.
3. This Order is without prejudice to the rights of the Debtors with respect to any and all adversary proceedings and contested matters (or any other actions or proceedings whether ongoing or not yet commenced) regarding claims or causes of action retained by the Debtors.
4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules are hereby satisfied by such notice.
5. Notwithstanding any Bankruptcy Rule or Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately enforceable upon its entry.
6. The Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this Order.
7. Verita shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first-class mail, as applicable, on all parties served with the

Motion, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF DOCUMENT]

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/

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